

From: Tom Jacob <tjacob@nationaltriallaw.com>
Subject: Re: Schmidt Exhibit Lists & Deposition Excerpts
Date: October 7, 2019 at 5:23 PM
To: Gilligan, Jim (USATXW) <Jim.Gilligan@usdoj.gov>



Thanks Jim — Agree. We will not be going to the court on this matter. I just wanted to see if this was we could agree to. But since we cannot agree, we will just abide by the Court's deadline. As for the medical records, please take a look at both the medical records and the billing records Plaintiffs have produced to see which ones we can reach an agreement in. I will talk to you Tuesday, October 22 to get final word on this matter.

Thanks,
Tom

On Oct 7, 2019, at 4:55 PM, Gilligan, Jim (USATXW) <Jim.Gilligan@usdoj.gov> wrote:

Tom

I called you today. We discussed your message from October 3, 2019 below. I explained I will be out attending a wedding part of October and need all the time the court allowed to prepare for this case. I explained that, as a result, I did not want to change the court's current scheduling now in place. I also told you that there is nothing I could do to prevent you from pursuing a modification if you desired to pursue one. I did agree that I should be able to read through the medical records in this case and we should be able to decide what medical records we can agree to and what medical records we will need to prove up by Tuesday, October 22, 2019. I may be mirroring the below, but wanted to piece it out in detail while it is fresh in my mind from the phone conversation. You take care.

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From: Tom Jacob <tjacob@nationaltriallaw.com>
Sent: Monday, October 7, 2019 4:43 PM
To: Gilligan, Jim (USATXW) <JGilligan@usa.doj.gov>
Cc: Jamal Alsaffar <jalsaffar@nationaltriallaw.com>
Subject: Re: Schmidt Exhibit Lists & Deposition Excerpts

Jim — good talking to you. I'll call you on the October 22nd and hopefully we can have a final word on which records we can agree to.

Thanks,
Tom

On Oct 3, 2019, at 3:22 PM, Tom Jacob <tjacob@nationaltriallaw.com>

wrote:

Jim,

Good talking to you. As promised, here is my email regarding the proposed dates for you to review so we can talk on Monday. For your reference, the pretrial conference is currently set for Thursday, November 14, 2019 at 10:30 AM.

The pretrial deadlines order, ECF Document #57 sets Nov. 11, 2019 as the deadline for exchanging exhibit lists, and deposition excerpts. Nov. 13 is the deadline for objections. My suggestion is that we agree to produce to each other our exhibit lists, exhibits, and deposition page&lines by **Nov. 4**. We also agree to exchange objections to each other on these by **Nov 8**. This will give us a few days to discuss our objections and see if we can reach any agreements before the pretrial conference.

Please consider these dates. I'll give you a call early next week to see if can make anything happen on this front.

Thanks,
Tom

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